

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	CR No.: 04-10098-WGY
	)	
	)	
	)	
v.	)	
	)	
	)	
	)	
CARMEN FIGUEROA,	)	
<i>Defendant</i>	)	

**MOTION TO CONTINUE SENTENCING**

NOW COMES, Carmen Figueroa, the Defendant in the above-captioned matter and moves through Counsel to continue her sentencing hearing from Monday, May 1, 2006 to Thursday, June 8, 2006; and / or another date convenient to this Court.

In support of this motion, counsel for the defendant states as follows:

1. Counsel has just finished a first degree murder trial that began March 22, 2006 in the Middlesex Superior Court, Commonwealth v. Taylor which lasted approximately three (3) and a half weeks.
2. Counsel has not been able to adequately prepare for this matter. Counsel seeks additional time to be able to meet with the Assistant United States Attorney regarding the safety valve issue and to prepare a sentencing memorandum to advance both downward departure issues and statutory sentencing concerns.
3. Counsel also seeks additional time to be able to research the possibility of hiring an expert evaluator to conduct a psychiatric evaluation of defendant for purposes of sentencing.
4. The additional time is in the interest of justice.

Respectfully submitted,  
**CARMEN FIGUEROA**  
By her Attorney;

Dated: April 21, 2006

/s/ John LaChance  
John H. LaChance, Esquire  
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Suite 501  
Framingham, MA 01702  
Tel: (508) 879-5730

**CERTIFICATE OF SERVICE**

I, John H. LaChance, Esq., do hereby certify that I have served a copy of the foregoing upon the government by means of the CMECF System upon Assistant United States Attorney Susan Postwistillo located at the Office of the District Attorney, One Courthouse Way, Suite 9200, Boston, MA 02110 on this 21<sup>st</sup> day of April, 2006.

s/s John LaChance  
John LaChance, Esquire

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